

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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In re: )  
GT Real Estate Holdings, LLC ) Chapter 11  
Debtor ) Case No. 22-10505 (KBO)  
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                                  ) **Re: Docket No. 112**

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**DECLARATION OF WARCO CONSTRUCTION, INC. IN SUPPORT OF  
MOTION TO CHANGE VENUE**

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I, Hannibal G. Warren, Jr., submit this declaration pursuant to 28 U.S.C. §1746:

1. I am the President of Warco Construction, Inc. (the "Company") and I am authorized to make this declaration on the Company's behalf.
2. The Company is a subcontractor to Mascaro/Barton Malow, a joint venture ("MBM") on the Carolina Panthers Headquarters and Training Facility located in Rock Hill, South Carolina (the "Project").
3. The Company has filed a mechanics' lien claim in the amount of \$1,111,055.80 and is a secured creditor in these bankruptcy proceedings.
4. The Company has its principal place of business at 3910 Stuart Andrew Blvd., Charlotte, North Carolina 28217. It does not maintain any offices in Delaware.
5. The Company has approximately 170 employees. None of the Company's employees are residents of, or are located in, Delaware.
6. The Company has never supplied any labor or materials to any Project in Delaware.

7. Throughout the performance of work on the Project, all of the Company's dealings relating to the Project have occurred at the Project.

8. The Company's principal place of business is approximately 18 miles from the Project.

9. The Company's principal place of business is approximately 88 miles from Greenville, South Carolina.

10. The Company does not regularly employ legal counsel in Delaware.

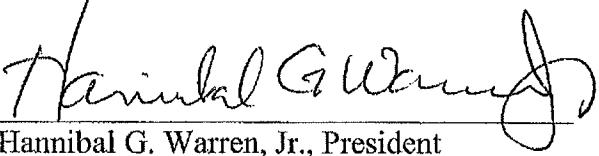
11. The Company does regularly use legal counsel located in Charlotte, North Carolina.

12. All of the Company's books and records related to the Project are located at its headquarters.

13. Actively participating in court proceedings in Wilmington, Delaware is prohibitive. Producing witnesses and documentary evidence through Delaware counsel in Delaware is substantially more expensive in terms of money and time than participating in proceedings in Greenville, South Carolina.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 12<sup>th</sup> day of July, 2022 in Charlotte, North Carolina.

Signed:



Hannibal G. Warren, Jr.

Hannibal G. Warren, Jr., President